

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 3:12-cv-30170-MAP

LISA KOSS,

Plaintiff

v.

PALMER WATER DEPARTMENT,
PALMER FIRE DISTRICT NO. 1 AND
PALMER WATER DISTRICT NO. 1,
WILLIAM COLE and CHARLES M.
CALLAHAN, III,

Defendants

AFFIDAVIT OF MICHEAL O. SHEA

Now comes Michael O. Shea and does depose and say under oath as follows:

1. I make this Affidavit on personal knowledge.
2. I am an Attorney with an office located at 3 Crane Park Drive, Suite 7, Wilbraham, Massachusetts 01095.
3. I represent the Plaintiff, Lisa Koss ("Plaintiff" hereinafter), in the above-captioned matter.
4. Attached as Exhibit A, to *Plaintiff's Memorandum in Support of Motion to Compel Documents Relating to Sexual Harassment Investigation* ("Plaintiff's Motion"), is a true and accurate copy of correspondence received by the Plaintiff from Henry L. Rigali, Esq. Counsel on or about February 9, 2012.
5. Attached as Exhibit B, to Plaintiff's Motion, is a true, accurate and complete copy of the Defendants' Privilege Log produced by Defendants' Counsel on August 15, 2013.

Signed under the pains and penalties of perjury this 22nd day of August, 2013.


Michael O. Shea